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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,) MAG. NO. 20-286-WRP
)
Plaintiff,) CRIMINAL COMPLAINT
)
vs.)
)
KHAYLA ALAPAI,)
)
Defendant.)
)

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true
and correct to the best of my knowledge and belief.

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Count 1

Possession of Methamphetamine with Intent to Distribute
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about March 5, 2020, within the District of Hawaii, KHA YLA ALAPAI, the defendant, did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

Count 2

Possession, Manufacture, or Distribution by Person on Board Aircraft
(21 U.S.C. §§ 960(a)(2) and 960(b)(1)(H))

On or about March 5, 2020, within the District of Hawaii, KHA YLA ALAPAI, the defendant, did knowingly and intentionally bring or possess on board a vessel, aircraft, or vehicle, a controlled substance, namely, 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 960(a)(2) and 960(b)(1)(H).

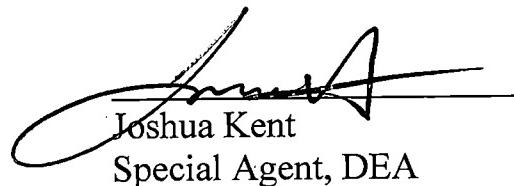
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I further state that I am a Drug Enforcement Administration (DEA) Special Agent and that this Complaint is based upon the facts set forth in the attached "Affidavit in Support of Criminal Complaint", which is attached hereto and incorporated herein by reference.

DATED: March 09, 2020, Honolulu, Hawaii.



Joshua Kent
Special Agent, DEA

Sworn to under oath before me telephonically and attestation acknowledged pursuant to FRCP 4.1(b)(2)

this 9 th day of March,
2020, at Honolulu, Hawaii



Wes Reber Porter
United States Magistrate Judge

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

JOSHUA KENT, being duly sworn, deposes and states as follows:

1. I am a Special Agent with the U.S. Drug Enforcement Administration (DEA) and am currently assigned to the DEA Honolulu Airport Task Force in Honolulu, HI.
2. On March 5, 2020, the Honolulu Sheriff's Office, Airport District, relayed information to the DEA that an individual suspected to be KHAYLA ALAPAI (ALAPAI) ran from a small aircraft while the aircraft was taxiing on the runway. The flight was bound from Oahu to Kauai. During ALAPAI's flight from the aircraft, a large quantity of a white crystalline substance fell out from ALAPAI's backpack and onto the floorboard of the aircraft.
3. On that same day, I arrived at Air Service Hawaii in the Airport Operations Area (AOA) and observed a large quantity of a white crystalline substance, loose and unpackaged, on the floorboard of the aircraft with tail number N7668B. Based on my training and experience, the white crystalline substance resembled crystal methamphetamine. On the floorboard of the aircraft, I also observed an open Ziploc bag containing suspected crystal methamphetamine residue and a closed Ziploc bag containing suspected crystal methamphetamine.
4. Approximately 335 gross grams of suspected crystal methamphetamine was seized from the floor of the aircraft. A portion of the aircraft's carpet was removed

and seized due to a significant amount of suspected crystal methamphetamine residue embedded in the carpet. The substance was field tested by the members of the DEA and resulted in a presumptive positive for the presence of methamphetamine.

5. I spoke with the pilot of the aircraft with tail number ending in 8B, who positively identified KHAYLA ALAPAI as the individual who ran from the aircraft. The pilot also said that ALAPAI was the only passenger for that charter flight. The pilot provided an invoice of the charter flight of March 5, 2020. The charter flight was paid via credit card under account holder "Khayla Alapai Naholoholo". The pilot also stated that ALAPAI later called and requested a refund since the flight had not taken off.

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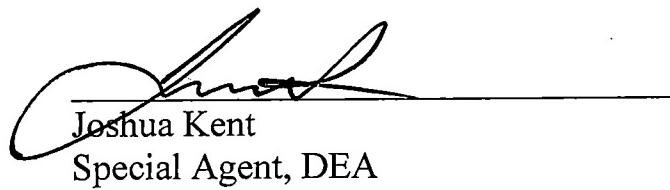
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CONCLUSION

6. Based on the foregoing facts, I respectfully submit that probable cause exists to believe that KHAYLA ALAPAI, the defendant, committed the aforementioned offenses.

Respectfully submitted,



Joshua Kent
Special Agent, DEA

This Criminal Complaint and Affidavit in support thereof were presented to, approved by, and probable to believe that the defendant above-named committed the charged crime found to exist by the undersigned Judicial Officer at 10:33 am on March 9, 2020.

Sworn to under oath before me telephonically and attestation acknowledged pursuant to FRCP 4.1(b)(2)

this 9 th day of March,
2020, at Honolulu, Hawaii



Wes Reber Porter
United States Magistrate Judge